

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MUNUSAMY KANDASAMY)
Plaintiff,)
v.) **Case No. 1:18-cv-00029 (AJT-TCB)**
ADVANCED SOFTWARE)
SYSTEMS, INC.,)
Defendant.)

ASSYST'S MOTION TO COMPEL DISCOVERY

Pursuant to Federal Rules of Civil Procedure 37 and 45 and Local Rule 37, Defendant, Advanced Software Systems, Inc. (“Assyst”), respectfully moves this Court to compel discovery against Charlson Bredehoft Cohen & Brown, P.C. (“**Charlson Bredehoft**”) to require prompt production of all responsive documents to Assyst’s subpoena for documents (the “**Subpoena**”) served upon Charlson Bredehoft in this matter. A corresponding memorandum, notice of hearing, and proposed order are being submitted with this motion.

Counsel hereby certifies that a good faith effort has been made to resolve the discovery matters at issue without court action.

Assyst requests that this Court order (1) Charlson Bredehoft to produce to Assyst all documents responsive to Requests 6 and 10 of the Subpoena, including all documents listed on Charlson Bredehoft’s submitted privilege log and unredacted versions of its documents already produced to Assyst, and that Charlson Bredehoft’s objections to Requests 6 and 10 be stricken; (2) Charlson Bredehoft to make such production no later than January 11, 2019; and (3) all other relief for Assyst deemed just and proper by this Court.

Respectfully submitted,

/s/

Timothy McConville, VSBN 40099
Luke Archer, VSBN 81815
PRAEMIA LAW, PLLC
11710 Plaza America Drive, Suite 2000
Reston, Virginia 20190
(703) 624-1776 (McConville telephone)
(931) 588-8018 (Archer telephone)
(703) 871-5111 (facsimile)
Timothy.McConville@praemialaw.com
Luke.Archer@praemialaw.com
Counsel for Advanced Software Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2019, I filed the foregoing document with the Clerk of Court using the Court's CM/ECF system, which will then send notification of this filing to the following filing users:

Robert Stone Porter, IV, Esq., VSB # 78934
THE SPIGGLE LAW FIRM
4830 31st Street South, Suite A
Arlington, VA 22206
(202) 449-8527 (telephone)
(202) 540-8018 (facsimile)
rporter@spigglelaw.com
Counsel for Plaintiff Munusamy Kandasamy

Jacob M. Small, Esq., VSB # 84460
J. Madison PLC
1750 Tysons Blvd., Suite 1500
McLean, Virginia 22102
(703) 910-5062 (telephone)
(703) 910-5107 (facsimile)
jmsmall@jmadisonplc.com
Counsel for Plaintiff Munusamy Kandasamy

I also sent the foregoing by electronic mail on January 4, 2019, to:

Elaine Bredehoft, Esq.
Peter Cohen, Esq.
Carla Brown, Esq.
David Murphy, Esq.
Charlson Bredehoft Cohen & Brown, P.C.
11260 Roger Bacon Drive,
Suite 201 Reston, VA 20190
Phone: (703) 318-6800
Fax: (703) 318-6808
ebredehoft@charlsonbredehoft.com
pcohen@charlsonbredehoft.com
cbrown@charlsonbredehoft.com
dmurphy@cbcblaw.com

/s/
Luke Archer